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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

18 AUG 20 PM 2:43

MANUFACTURERS ALLIANCE
INSURANCE COMPANY,

Plaintiff,

v.

ALLERTON CHARTER COACH, INC.,
DENNIS TOEPPEN and THE PEOPLE OF
THE STATE OF ILLINOIS ex rel LISA
MADIGAN, Attorney General of the State of
Illinois,

Defendants.

Case No.: 1:18-cv-04013
Honorable Matthew F. Kennelly

FILED

AUG 20 2018

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

MOTION TO TRANSFER VENUE

1. 28 U.S. Code § 1404 allows for the transfer of an action to a different district for the convenience of parties and witnesses, in the interests of justice, to a district where said action may have been brought
2. All defendants reside in the Central District of Illinois which includes Champaign County, Illinois. Allerton Charter Coach has its principal place of business in Champaign County with offices and property located in Champaign County. Dennis Toeppen resides in Champaign County as well.
3. Employees of Allerton Charter Coach, who could potentially be witnesses in this case, reside in the Central District of Illinois.
4. Attached hereto is the affidavit of Dennis Toeppen on behalf of Defendants Toeppen and Allerton confirming that the Central District of Illinois and Champaign County is the venue that is most proper.

5. The interests of justice are best served by transferring the matter to the Central District of Illinois as it was the situs of material events alleged in Attorney General of Illinois' complaint which is the impetus of Plaintiff's complaint in this matter, it provides the best ease of access to sources of proof, it is more convenient for witnesses and more convenient for the parties.

WHEREFORE, Defendant, Allerton Charter Coach prays that this Court transfer venue of this action from the Northern District of Illinois to the Central District of Illinois

BY:  8/17/18

Dennis Toeppen, individually and as
Representative of Allerton Charter Coach

PROOF OF SERVICE

The undersigned Defendant, under penalties as provided by law pursuant to the Illinois Supreme Court Rule 12 and 735 ILCS 5/1-109, certify that I electronically filed **Motion to Transfer Venue** with the United States District Court by using the Pacer/ECF system on the ____ day of August, 2018.

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I further certify that I served a copy of the foregoing document(s) on the following parties or their counsel of record ~~via email~~ on the 21 day of August, 2018.

via USPS

BY:  8/17/18